

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**R.A.Jr., (a minor child, by and through his  
Father and next best friend, Richard Lemmel  
Arnold,**

**Plaintiff,**

**V.**

**DEPUTY SHERIFF WALTER LACEY,**  
**in his official and individual capacity**  
**Defendant.**

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**)Case No.: 3:06-CV-337-WHA**

**PLAINTIFF'S PROPOSED VOIR DIRE**

1. Could you raise your hand if you do NOT have any children?
2. If you home school your children, could you please explain why?
3. Of those who have children, has your child ever come in contact with a law enforcement officer?
4. Has your child ever been prosecuted in the juvenile justice system?
5. Have any of you gone to court and had a trial on a traffic ticket?
6. Have any of you been accused of a misdemeanor offense other than a traffic ticket?
7. Have any of you been victimized by a bully during your childhood?
8. Have any of you been accused by another person, of something you did not do?

If yes, how did you feel about the person accusing you?

9. Are you or any of your family members or close friends private investigators?
10. Do any of you participate in a neighborhood watch program?

11. Would you please raise your hand if you enjoy watching law enforcement shows such as Law and Order, Court TV, Nancy Grace on TV?

12. Do any of you feel that the testimony of a police officer is entitled to more weight than the testimony of a private individual?

13. Do any of you feel that the testimony of an adult should be given more weight than that of child?

14. Do or have you, your family members, or close friends work in the area of social services, such as the department of human resources.

15. Were any of you previously employed as a teacher, bus driver or otherwise employed at a school?

If yes, why did you leave that job?

16. Are any of your family members teachers, bus drivers, janitor, food service worker or otherwise employed affiliated with any school system

17. This case involves the alleged violation of the Fourth Amendment to the United States Constitution which states that every citizen has the right not to be subjected to excessive or unreasonable force while being arrested or seized by a law enforcement officer. Do any of you believe that this keeps an officer from doing his job?

18. Do you believe that a police officer should be able to use force against a citizen even if there is no crime being committed?

19. Is there any person here who does not know the purpose of the Constitution of the United States of America?

20. Is there any person here that believes that American citizens have too much protection from government intrusion into our homes and personal lives?

21. Do any of you know, or are any of you related in any way to Deputy Walter Lacey?

22. Do you know, in any way, Winston Sheehan who represents Deputy Walter Lacey and works for Ball, Ball, Mathews and Novak in Montgomery?

23. Has he or his firm ever performed legal services for you or your family?

24. Do any of you know people who work at or are related to people who work at the law firm Ball, Ball, Mathews and Novak in Montgomery, Alabama?

25. Does the fact that the plaintiff is a member of a minority group make it more difficult for you to consider the facts objectively and render a verdict in his favor than if he were not a member of such group?

26. Do you have any feelings of prejudice against organizations that support civil rights such as the American Civil Liberties Union or the Southern Poverty Law Center?

If yes, could you explain why you feel this way?

27. Do you have any feelings, one way or the other, about persons who sue police officers?

28. Do any of you believe that police officers should not be sued under any circumstances?

29. Have any of you, thus far, formed an opinion about the plaintiff's right to recover damages from the defendant?

30. Do any of you believe that a plaintiff in a civil suit who proves his case to your satisfaction should not be compensated for his injury?

31. Do any of you believe that you should not sue for money if your constitutional rights have been violated?

32. If the plaintiff is able to prove to you that the acts of Deputy Lacey were committed with malice or reckless indifference would any of you have trouble considering an award of punitive or punishment damages?

33. Do any of you believe that our civil legal system is unfair to defendants?

Respectfully submitted this the 27<sup>TH</sup> day of April, 2007.

**s/Arlene M. Richardson**  
Bar Number ASB 9452-I60A  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>TH</sup> day of April 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

C. Winston Sheehan, Jr., Esq.  
Ball, Ball, Matthews & Novak, P.A.  
P.O. Box 2148  
Montgomery, AL 36102-2148

and I certify that I have hereby mailed by U.S. Postal Service the document to the following non CM/ECF participants: NONE

**s/Arlene M. Richardson**  
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